

## Exhibit 30

Francesco Gallo

3/13/2008

1	Gallo	212	1	Gallo	214
2	marked Galli Exhibit 3. This is an exchange of		2	Q. Okay. And how about Mambro?	
3	emails between Giulio Libutti and Francesco Cesari,		3	A. Manager at catering, Kennedy Airport.	
4	which was ultimately forwarded to you by		4	Q. Were all these people terminated, the ones	
5	Mr. Libutti, correct?		5	whose names you've just explained?	
6	A. Yes.		6	A. As of today? I don't know.	
7	Q. What is the subject matter of this		7	Q. Were they all terminated around March of	
8	exchange between Mr. Libutti and Mr. Cesari?		8	2006 or sometime after that?	
9	A. Terminating employees.		9	A. I don't know because I wasn't there. I	
10	Q. Terminating which employees? Which		10	think left this situation and by that time, I was	
11	employees?		11	terminated myself.	
12	A. The one reported in the same document.		12	Q. Was it proposed to terminate all of those	
13	Q. Well, they're station managers, aren't		13	people?	
14	they?		14	A. To find any way, right, to substitute	
15	A. Not all of them.		15	them.	
16	Q. Not all of them?		16	Q. To replace them?	
17	A. No.		17	A. Right.	
18	Q. All right. Who is Petrillo? Who was		18	Q. Do you know why all these people at the	
19	Petrillo, I should say?		19	stations were being replaced?	
20	A. Was a VIP, VIP manager and duty manager.		20	A. Same program.	
21	Q. At JFK, correct?		21	Q. Same program that you --	
22	A. At JFK, yes.		22	A. Many years, too old.	
23	Q. All right. And who was Triaca? If you		23	Q. Oh, you think it was because they were too	
24	don't know, you can say that.		24	old?	
25	A. I know it. Triaca was the duty manager,		25	A. Not think, I know.	
1	Gallo	213	1	Gallo	215
2	station manager in Boston, who passed away.		2	Q. Who told you that?	
3	Q. Who passed away?		3	A. Everyone, Libutti, Galli, everyone at	
4	A. Uh-huh.		4	Alitalia knew it.	
5	Q. And Mario Bruno, who was he?		5	Q. Did Libutti tell you, we are replacing	
6	A. Station manager in Chicago.		6	station managers because they're too old?	
7	Q. When did Mr. Triaca pass away?		7	A. Luca Bruni --	
8	A. I believe six or seven months after he was		8	Q. Answer my question about Libutti. Did	
9	terminated.		9	Libutti tell you that they are replacing station	
10	Q. Barreca was in Chicago. And Morrow?		10	managers because they're too old?	
11	A. Barreca?		11	A. Yeah, sure, yeah.	
12	Q. I'm sorry, isn't that what you just said?		12	Q. He said that?	
13	A. No. You asked me about Mario Bruno.		13	A. Yes.	
14	Q. Oh, I'm sorry.		14	Q. When?	
15	A. And I told you Chicago.		15	A. Many, many instances, but were not just	
16	Q. Mario Bruno was Chicago, sorry. And		16	the station managers, were, you know.	
17	Barreca?		17	Q. We're talking about station managers now.	
18	A. Barreca was, I don't know if he still is,		18	A. Station managers.	
19	station manager in Toronto, Canada.		19	Q. And Mr. Galli also told you that they were	
20	Q. And Morrow?		20	replacing station managers because they were too	
21	A. Duty manager at Newark.		21	old?	
22	Q. Do you remember the name of the station		22	A. He didn't tell me, but he was aware of.	
23	manager in Miami?		23	Q. All right. Whose decision was it to	
24	A. Yes, last name Micheli, and the first		24	replace these people at the stations, if you know?	
25	name, Essa.		25	A. Mr. Cesari, with concurrence of the	

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1 Gallo 216  
 2 responsible sales manager of North America.  
 3 Q. What do you mean by the responsible sales  
 4 manager of North America?  
 5 A. These are example, Cesari, Francesco and  
 6 Libutti, Giulio.  
 7 Q. Giulio Libutti was the Senior Vice  
 8 President for Sales in North America, correct?  
 9 A. Yes, sir.  
 10 Q. How do you know that it was his decision  
 11 to terminate people at the stations?  
 12 A. Because I knew it. We discussed several  
 13 times because were not just, you know, the  
 14 operational managers or employees.  
 15 Q. Do you know why Mr. Libutti forwarded this  
 16 exchange with Mr. Cesari to you?  
 17 A. Yes.  
 18 Q. Why?  
 19 A. To find the solution to terminate them.  
 20 Q. He needed you to find the solution to  
 21 terminate them?  
 22 MR. KOCIAN: Objection.  
 23 Q. Is that right?  
 24 A. That's what he did all the time, yes.  
 25 Q. That's what he did all the time?

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1 Gallo 217  
 2 A. Yes.  
 3 Q. Did you find any solutions to terminate  
 4 any of these people?  
 5 A. I was working on it. And what I did  
 6 propose was to find an agreement, a settlement, to  
 7 have these people replaced if they didn't want  
 8 lawsuit.  
 9 Q. You proposed to Mr. Libutti that each of  
 10 these individuals who were to be terminated should  
 11 be given some kind of package as a settlement?  
 12 A. Right, yes.  
 13 Q. Okay. What did Mr. Libutti say to that  
 14 proposal?  
 15 A. I don't remember.  
 16 Q. Did you make that proposal in writing,  
 17 say, in an email?  
 18 A. No, absolutely.  
 19 Q. No, absolutely?  
 20 A. No.  
 21 Q. You just spoke with him?  
 22 A. Yes. These issues of this particular  
 23 nature, nothing in writing.  
 24 Q. Well, Mr. Libutti forwarded this writing  
 25 you to, didn't he? I mean, didn't he put things in

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1 Gallo 218  
 2 writing?  
 3 A. Libutti, no, he did not. Only put in  
 4 writing was Cesari.  
 5 Q. Well, Cesari was responding to an email  
 6 from Libutti, wasn't he?  
 7 A. Right, but as you can see --  
 8 Q. What was Cesari's position at this time,  
 9 if you know?  
 10 A. I believe that he was responsible for the  
 11 foreign stations, overseas airports where Alitalia  
 12 worked.  
 13 Q. He was based in Rome, correct?  
 14 A. He was based up to a certain time in Rome,  
 15 Fiumicino, then I believe was transferred to Milano,  
 16 but at this time, I believe he was in Rome, right.  
 17 Q. And he was responsible for all the  
 18 overseas airports, the operations in all overseas  
 19 airports?  
 20 A. I believe so.  
 21 Q. Okay.  
 22 A. Or certain parts, if not all worldwide.  
 23 Q. And the station is the same thing as  
 24 airport; is that correct?  
 25 A. Yes. Actually, it's an Alitalia presence

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1 Gallo 219  
 2 in an airport.  
 3 Q. And the people associated with the  
 4 stations, they reported to Cesari?  
 5 A. Functionally, yes.  
 6 Q. And for human resources, they reported to  
 7 New York?  
 8 A. To New York, right.  
 9 Q. Is that correct?  
 10 A. That is correct.  
 11 Q. And at the time that you left Alitalia in  
 12 May of 2006, had any of these people been  
 13 terminated?  
 14 A. At that time I don't recall, but --  
 15 MR. KORAL: I'm sorry, could you read that  
 16 answer back?  
 17 A. I did not finish my answer.  
 18 Q. Oh, okay.  
 19 A. I was thinking. The question was?  
 20 (Pending question was read.)  
 21 A. I don't recall. I don't think so.  
 22 Q. Okay. Did anybody ever tell you --  
 23 A. Excuse me, excuse me. I believe could be  
 24 Petrillo, which he accepted package, could be the  
 25 only one.

Francesco Gallo

3/13/2008

1	Gallo	220	1	Gallo	222
2	Q. Oh, you think Petrillo was given the		2	Q. From whom?	
3	package before you left?		3	A. Mr. Libutti.	
4	A. The settlement, whatever it was, Petrillo		4	Q. He told you that there was a cleanup?	
5	and Morrow, if I recall well.		5	A. And other people.	
6	Q. You're not sure?		6	Q. Let's start with Mr. Libutti; what did he	
7	A. I'm not sure.		7	tell you?	
8	Q. So some packages already had been prepared		8	A. Tell me, and said also to other people,	
9	by the time you left Alitalia in May?		9	that North America needed a good cleanup, too many	
10	A. Yes.		10	gays, too many old people, too many no look.	
11	Q. Who prepared the packages?		11	Q. That's what Libutti said?	
12	A. What do you mean by who prepared the		12	A. Yes.	
13	packages?		13	Q. Did he say that was on orders from Rome or	
14	Q. Who decided what to offer these people;		14	that was his own idea?	
15	did you make any decisions about that?		15	A. I don't know. I don't remember.	
16	A. No.		16	Q. You said he said it to you several times?	
17	Q. Did Mr. Libutti?		17	A. Yes.	
18	A. I think it was Mr. Cesari.		18	Q. You said other people said it, as well?	
19	Q. It came from Rome?		19	A. To other people, as well.	
20	A. And his boss, right.		20	Q. Oh, he said it to other people; how do you	
21	Q. Okay. It came from Rome?		21	know that?	
22	A. Yes.		22	A. Because he said to other people as about	
23	Q. Did you discuss packages with Mr. Cesari?		23	me, as well.	
24	A. I might.		24	Q. That's not really an answer to the	
25	Q. You don't recall?		25	question.	
1	Gallo	221	1	Gallo	223
2	A. I don't recall.		2	How do you know that Mr. Libutti told	
3	Q. Did anybody ever tell you that the		3	other people that North America needed a cleanup?	
4	terminations of people at the stations had to do		4	A. Because someone else told me that he refer	
5	with a, quote, "cleanup," close quote, that had been		5	to me to be cleaned up.	
6	ordered from Rome of North American operations?		6	Q. Who told you that?	
7	A. Cleanup?		7	A. I don't remember. I'm trying to remember	
8	Q. Yes.		8	the name, but it's a lady that was working not too	
9	THE WITNESS: I'm sorry.		9	far from Mr. Libutti's office.	
10	(Pending question was read.)		10	Q. A lady working not too far from	
11	A. See, the word "cleanup" to me it's --		11	Mr. Libutti's office?	
12	MR. KOCIAN: He's asking you a specific		12	A. I don't remember the name.	
13	question. In fact, he put it in quotes. Do		13	Q. Was she a manager?	
14	you recall hearing that?		14	A. I believe she was a specialist, not a	
15	A. No, it was not, what I recall was not just		15	manager.	
16	the airport, it was Alitalia North America.		16	Q. Was she sitting at a desk outside	
17	Q. So you did hear that Alitalia North		17	Mr. Libutti's office?	
18	America was having terminations because of a, quote,		18	A. Yes.	
19	"cleanup," close quote, of North America?		19	Q. But you can't recall her name?	
20	A. No, because of a plan, Alitalia wanted to		20	A. I'm trying.	
21	replace older people.		21	Q. Was she a secretary?	
22	Q. The question is, did you ever hear the		22	A. No, no, no, was not a secretary.	
23	term, "cleanup of North America."		23	Q. But she didn't have a private office of	
24	A. The term, "cleanup," yes, I heard several		24	her own?	
25	times.		25	A. Actually, if I recall well, he made a	

10 (Pages 220 to 223)

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